

54391

NOV 15 1990

EXPRESS MAIL  
RETURN RECEIPT REQUESTED

Mr. Stephen W. Holt  
NL Industries, Inc.  
Corporate Environmental Services  
P.O. Box 1090  
Hightstown, N.J. 08520

Dear Mr. Holt:

On November 1, Michael Gilbert of my staff and the Biological Technical Assistance (BTAG) met to discuss the sampling of downstream areas between the NL Industries site and the Delaware River, and the Phase III Sampling Plan submitted by O'Brien & Gere (OBG), NL's contractor, dated October 16, 1990. As a result of that meeting and relevant discussions, the following are amendments to the sampling plan, which is hereby unilaterally amended by the U.S. Environmental Protection Agency (EPA) under Section I of the Administrative Order on Consent, dated April 25, 1986. The amended Sampling Plan, which is part of the Remedial Investigation/Feasibility Study (RI/FS) Workplan is hereby approved. These amendments are in addition to specific requirements detailed in letters from EPA to NL dated September 19, 1990 and October 5, 1990.

Sediment samples should be taken at the following depths: 0-6", 6-12" and 12-18". Sample locations will be chosen by BTAG staff. OBG will be directed to the sampling location by BTAG or EPA staff, or by EPA's contractor. Samples will not be composited across the stream. They will be taken from depositional area only, as directed by BTAG or EPA staff, or by EPA's contractor. The manner in which the samples will be obtained and handled was discussed during a conference call with Laura Scalise, the Project Quality Assurance Officer, Michael Gilbert, the Project Manager, you and your contractor. Samples should be collected as described below.

One of the stream sediment samples will be analyzed for volatile organics and semivolatiles (base neutrals, acid extractables, pesticides and PCBs. At this location, the split spoon will be open and divided into three zones: 1-6", 6-12" and 12-18". Two 40-ml vials will be filled for each sample (zone) and two vials will be filled for each contractor, namely OBG and EBASCO, EPA's contractor.

SYN	---	SNJCS	SNJCS	NJCB				
SURNAME	---	GILBERT	LA PADULA	BASSO				
DATE	-----	11/7/90	11/7/90	OB 11/14				NLI 001 2362

Note that in order to obtain the volume of sample required, more than one split spoon may be needed from each location. Each split spoon sample should be collected upstream from the previous one, while still in the depositional area. For semivolatile samples, each 6" zone will be placed in a stainless steel bowl and combined with the same zone from other samples taken at the same location. The sample will be homogenized with a stainless steel spoon (the same spoon used to collect the volatile organics) for a total of three (3) semivolatile samples (1-6", 6-12" and 12-18").

The split spoon will be equipped with a stainless steel "eggshell" tip to prevent sample loss during extraction from the stream. As volatile organic samples are not to be homogenized some variation between sample results may be expected.

The sampling method for metals, total organic carbon, and grain size consists of 18" cones collected from the stream and frozen intact. If more volume of sample is required, more than one sample may be collected from the depositional area and later homogenized by 6" intervals at the lab. Ebasco will accept splits from OBG's lab. It is recommended that flow velocity measurements be taken at the sampling locations.

Methods of analysis are as follows: 8240 for volatiles (gc/ms), 8270 for semivolatiles (gc/ms), and 8080 for pesticides/PCBs(gc). In addition, a copy of TOC method in sediments was faxed to OBG labs immediately after the conference call held on October 29, 1990.

In addition to the parameters to be analyzed listed in the Phase III Sampling Plan, total metals, not only total lead, must be analyzed. These metals are: antimony, arsenic, cadmium, chromium, copper, lead, selenium and zinc which were detected during previous sampling in the West Stream.

In response to a request for an extension by you and your contractor, the wetland delineation and environmental assessment will be due to EPA by December 17, 1990. Please note that the area of concern should include the site and the floodplains of the East and West Streams.

Please respond in writing within five (5) working days from receipt of this letter whether NL will comply with this sampling plan and sample as scheduled during the week of November 26, 1990. If NL chooses not to comply, EPA will make alternative arrangements to obtain the samples.

If you have any questions on the above, please call Michael Gilbert of my staff at (212) 264-6418.

Sincerely yours,

Raymond Basso, Chief  
New Jersey Compliance Branch

cc: F. Hale, O'Brien & Gere  
D. Rubin, EBASCO  
C. Holstrom, NJDEP

bcc: J. La Padula, SNJCS  
M. Gilbert, SNJCS  
L. Scalise, MMB

UNITED STATES POSTAL SERVICE  
OFFICIAL BUSINESS



**SENDER INSTRUCTIONS**

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE  
USE, \$300

RETURN  
TO

Print Sender's name, address, and ZIP Code in the space below.

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region II

26 Federal Plaza

New York, New York

Room: 720

10278

attn: Michael Gilbert

NLI 001 2365